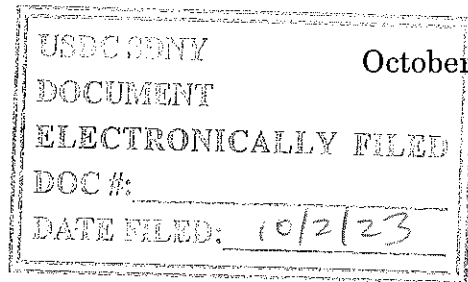


THE LAW OFFICE OF CARLOS M. SANTIAGO, P.C.

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October 2, 2023

**BY ECF**

Honorable Richard M. Berman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: **United States v. Xuliang Hou and Yuna Lin**  
**23 Cr. 482 (RMB)**

Dear Judge Berman:

I represent Ms. Lin in the above referenced matter pursuant to the Criminal Justice Act, 18 USC §3006A. I write on behalf of both clients—and with the consent of the government—to request a modification to the bond conditions set forth by the Court on September 21, 2023.<sup>1</sup> As the Court is aware, both clients were prepared to post their property in Philadelphia County, Pennsylvania.<sup>2</sup> However, it has been difficult to ascertain the proper procedure for doing so in that jurisdiction.<sup>3</sup> In response, the Court endorsed counsel's request for an extension of time to secure their bonds with real property.<sup>4</sup>

Counsel for both parties respectfully request that, for the purpose of securing their bonds with real property, the Philadelphia property referenced as the "Kingfield" property on the Court's docket sheet be replaced with another property jointly owned by our clients. This property is a multi-unit dwelling located in Queens County, New York, which will be referenced to as the "208<sup>th</sup> St. property."<sup>5</sup> Securing their bond with a property located within the state of New York will drastically increase the speed at which our clients will be able to comply with the Court's deadline and satisfy this remaining condition. All other bail conditions have been met.

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<sup>1</sup> Dkt. 6 & 7.

<sup>2</sup> Dkt. 8.

<sup>3</sup> Id.

<sup>4</sup> Dkt. 9.

<sup>5</sup> For the purposes of confidentiality, the specific address will not be placed in this letter request however, will be included in the affirmation of judgment necessary to secure the bond as well as the Court and AUSA.

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As noted, the government consents to this request. The Court's attention to this matter is greatly appreciated.

Respectfully submitted,

/s/ \_\_\_\_\_  
Carlos M. Santiago, Jr.  
Attorney for Ms. Lin

cc: AFD Clay H. Kaminsky  
AUSA Benjamin Burkett

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| <u>Modification granted on</u><br><u>consent.</u> |   |
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| SO ORDERED:<br>Date: <u>10/2/23</u>               | <u>Richard M. Berman</u><br>Richard M. Berman, U.S.D.J. |